

Proposed Revisions/Additions to Recommendations Related to Measurement Tools

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*Note: language not currently in initial draft is in **bold**; deleted language is in ~~strikethrough~~. Basic editorial changes are not shown.*

Recommendation 2: Ecology should regularly update and distribute the reference materials developed through the IWG related to emission sources, ~~calculation~~**assessment** tools, and mitigation options.

This is particularly important in the case of new emerging tools, which could be useful for greenhouse gas emissions assessment under SEPA. In updating the ~~calculation~~-tools reference materials, Ecology should coordinate with other state agencies that are looking at tools for similar purposes to help achieve statewide consistency in tools used.

Recommendation 3: Ecology should work with other state agencies to develop basic tools for recommended use within the SEPA process to make ~~measurement~~**assessments** predictable and not overly burdensome. Any tools developed should be both effective and easy to use and be useful for “typical” SEPA applications. **In particular, the IWG recommends that easy-to-use tools, both qualitative and quantitative, be identified and/or developed in the following areas:**

- **VMT forecasting and GHG tailpipe emission factors for on-road traffic for large and small projects and plans,**
- **Embodied emissions,**
- **Loss of sinks,**
- **Reduction in space heating and electricity use for residential, commercial, and industrial buildings**
- **Mitigation effectiveness.**

Recommendation X (new): The SEPA IWG recognizes that easy to use tools are not currently available for estimating future emissions from all sources, and it may be some time before adequate tools are available. We also recognize that quantitative evaluation may not be practical or warranted for some types of proposals (e.g., small, routine projects). Therefore, the IWG recommends that applicants be able to conduct a qualitative analysis of greenhouse gas emissions in cases where a) adequate tools do not exist, b) criteria outlined in SEPA guidance requiring a quantitative evaluation are not met, or c) there is an established alternative to quantification (e.g., a “green list” or programmatic analysis of the proposed action). Qualitative tools may include check lists, decision trees, stream-lined assessments or screening tools where assumptions and approximations dictate that the results are qualitative in nature. Ecology should provide guidance on when qualitative analysis is acceptable and what constitutes an acceptable qualitative description of emissions.